

Peter J. Richardson ISB # 3195
Gregory M. Adams ISB # 7454
RICHARDSON ADAMS, PLLC
515 N. 27th Street
Boise, Idaho 83702
Telephone: (208) 938-2236
Fax: (208) 938-7904
peter@richardsonadams.com
greg@richardsonadams.com

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IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for the Industrial Customers of Idaho Power

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE)	CASE NO. IPC-E-16-08
APPLICATION OF IDAHO POWER)	
COMPANY FOR AUTHORITY TO)	COMMENTS OF THE INDUSTRIAL
IMPLEMENT POWER COST)	CUSTOMERS OF IDAHO POWER
ADJUSTMENT ("PCA") RATES FOR)	
ELECTRIC SERVICE FROM JUNE 1,)	
<u>2016 THROUGH MAY 31, 2017</u>)	

COMES NOW, The Industrial Customers of Idaho Power ("ICIP") by and through their attorney of record, Peter J. Richardson, and pursuant to that Notice of Application and Notice of Modified Procedure issued by the Idaho Public Utilities Commission ("Commission") in Order No. 33518 and hereby lodges its Comments on Idaho Power Company's ("Idaho Power" or "Company") 2016-2017 annual Power Cost Adjustment ("PCA") Application.

**THE COMPANY'S PCA SHOULD ACCOUNT FOR
KNOWN ANTICIPATED CHANGES IN PURPA POWER SUPPLY EXPENSES**


As the Commission observed in Order No. 33518, "The Company attributes the proposed [PCA] rate increase primarily to costs associated with power purchase agreements under PURPA, specifically, the addition of new solar contracts." Recent media reports indicate that the Energy Sales Agreement ("ESA") between Idaho Power and Pocatello Solar 1, LLC, (a

PURPA agreement)¹ has been terminated. If true, accounting for this reduction in Idaho Power's PURPA cost obligations will have a downward impact on the proposed PCA increase this year. The ICIP has served discovery on Idaho Power seeking to confirm the media reports. Currently, however, it is unclear how (and whether) the Company is planning to update the forecast power supply cost component of this year's PCA to account for this possible (and if accurate) anticipated known and measurable change. The ICIP understands the possible termination of the Pocatello Solar 1, LLC ESA will result in a twenty megawatt reduction in forecast power supply cost obligations.²

Given the short amount of time before the 2016-2017 PCA is to take effect, the ICIP respectfully asks the Commission to require the Company to, when it files its updated PCA to document and, if the media reports are accurate, to account for this change in the final rates to become effective on June 1, 2016.

DATED this 19th day of May, 2016

Richardson Adams, PLLC

By 
Peter J. Richardson
Industrial Customers of Idaho Power

¹ See *Application for Energy Sales Agreement with Pocatello Solar 1, LLC* in Docket No. IPC-E-14-2. Approved by Order No. 33207 issued on November 21, 2014.

² A copy of the ICIP's production request is attached hereto as Exhibit 1.

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of May 2016, copies of the foregoing Comments of the Industrial Customers of Idaho Power in Docket No. IPC-E-16-08 was served electronically and by HAND DELIVERY, to:

Lisa Nordstrom
Idaho Power Company
1221 West Idaho
Boise, Idaho 83702
lnordstrom@idahopower.com

Timothy E. Tatum
Idaho Power Company
1221 West Idaho
Boise, Idaho 83702
ttatum@idahopower.com

Jean Jewell
Secretary
Idaho Public Utilities Commission
472 West Idaho
Boise, Idaho 83702
Jean.jewell@puc.idaho.gov



Kandi Walters
Administrative Assistant

CASE NO. IPC-E-16-08

COMMENTS OF THE INDUSTRIAL
CUSTOMERS OF IDAHO POWER

EXHIBIT #1

Peter J. Richardson ISB # 3195
Gregory M. Adams ISB # 7454
RICHARDSON ADAMS, PLLC
515 N. 27th Street
Boise, Idaho 83702
Telephone: (208) 938-2236
Fax: (208) 938-7904
peter@richardsonadams.com
greg@richardsonadams.com

Attorneys for the Industrial Customers of Idaho Power

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE)	CASE NO. IPC-E-16-08
APPLICATION OF IDAHO POWER)	
COMPANY FOR AUTHORITY TO)	SECOND PRODUCTION REQUEST
IMPLEMENT POWER COST)	OF THE INDUSTRIAL CUSTOMERS
ADJUSTMENT ("PCA") RATES FOR)	OF IDAHO POWER
ELECTRIC SERVICE FROM JUNE 1,)	
<u>2016 THROUGH MAY 31, 2017</u>)	

Pursuant to Rule 225 of the Rules of Procedure of the Idaho Public Utilities Commission (the "Commission"), The Industrial Customers of Idaho Power ("ICIP") by and through their attorney of record, Peter J. Richardson, hereby requests that Idaho Power Company ("Company") provide the following documents.

This production request is to be considered as continuing, and the Company is requested to provide by way of supplementary responses additional documents that it or any person acting on its behalf may later obtain that will augment the documents produced.

Please provide one physical copy and one electronic copy, if available, of your answer to Mr. Richardson at the address noted above. Please provide an additional electronic copy, or if unavailable a physical copy, to Dr. Don Reading at: 6070 Hill Road, Boise, Idaho 83703, Tel: (208) 342-1700; Fax: (208) 384-1511; dreading@mindspring.com

For each item, please indicate the name of the person(s) preparing the answers, along with the job title of such person(s) and the witness at hearing who can sponsor the answer.

REQUEST FOR PRODUCTION NO. 10

On page 10 of the Direct Testimony of Idaho Power witness Matthew Larkin he states this year's PCA forecast anticipates an increase of 257,857 MWh of PURPA generation over last year's forecast. This increase is largely due to the expected 320 MW of solar projects. The Pocatello Airport on May 16, 2016 announced the solar project planned on their property has been withdrawn. Please fully answer the following;

- a) Was the Pocatello Airport solar project included in this year's PCA forecast?
- b) If so what was the size of the solar project at the Pocatello Airport?
- c) If so what should be the reduction in the projection of MWh from this year's PCA forecast?
- d) If so what should be the dollar reduction in the Account 555, PURPA that is included in this year's PCA request by the Company?
- e) Does the Company intend to update its Application in this matter to reflect this change? Why or why not?

DATED this 18th day of May, 2016

Richardson Adams, PLLC

By


Peter J. Richardson

Industrial Customers of Idaho Power

SECOND PRODUCTION REQUEST OF THE INDUSTRIAL CUSTOMERS OF IDAHO
POWER

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CERTIFICATE OF SERVICE

I hereby certify that on May 3rd, 2016, copies of the foregoing First Production Request of the Industrial Customers of Idaho Power in Docket No. IPC-E-16-08 were served electronically and by HAND DELIVERY, to:

Lisa Nordstrom
Idaho Power Company
1221 West Idaho
Boise, Idaho 83702

Timothy E. Tatum
Idaho Power Company
1221 West Idaho
Boise, Idaho 83702

Jean Jewel
Secretary
Idaho Public Utilities Com'n
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Boise, Idaho 83702



Kandi Walters
Administrative Assistant

**SECOND PRODUCTION REQUEST OF THE INDUSTRIAL CUSTOMERS OF IDAHO
POWER
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CERTIFICATE OF SERVICE

I hereby certify that on May 18, 2016, copies of the foregoing Second Production Request of the Industrial Customers of Idaho Power in Docket No. IPC-E-16-08 were served electronically and by HAND DELIVERY, to:

Lisa Nordstrom
Idaho Power Company
1221 West Idaho
Boise, Idaho 83702
lnordstrom@idahopower.com

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Administrative Assistant

SECOND PRODUCTION REQUEST OF THE INDUSTRIAL CUSTOMERS OF IDAHO
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